

Report

Temporary Fairground off Princess Margaret Way,
Neath Port Talbot

Odour Management Plan

For GJ Planning

13 October 2025

Odour Management Plan

Site name: Temporary Fairground off Princess Margaret Way, Neath Port Talbot

Site address: Princess Margaret Way, Neath Port Talbot, South Wales

Operator name: Studt's Events Ltd

Document number: 17165A-10-R01-F-OMP

Permit number: To be confirmed

Who is this plan for?

The Odour Management Plan (OMP) is a 'live' document. It is the responsibility of the Site Manager to be fully aware of its contents and to provide relevant training to staff.

This plan is to be read by the Site Manager; members of staff trained in the requirements of the OMP and permit conditions and contractors working on site.

Document owner

Original document author: Air Quality Consultants Ltd, on behalf of GJ Planning

Revision number	Author	Date	Approver
01	Emily Portergill and Hannah Jacobs	13/10/25	Penny Wilson

Revision History

01 13/10/2025

Contents

1	Introduction	1
1.1	Site description	1
1.2	Maintenance and review of the OMP	3
1.3	Relevant sector guidance on which this OMP is based	3
2	Odour Risk Assessment	4
2.1	Overview of odorous processes	4
2.2	Sensitive Receptors	4
3	Odour Control Measures and Best Practice	6
4	Odour Incidents	7
5	Appendices	8
A1	Odour in Legislation, Policy and Guidance	9
A2	Odour Risk Assessment Approach	11
A3	Odour Risk Assessment	14
A4	Sniff test procedure and form	20
A5	Odour complaints report form	22

1 Introduction

This document comprises the Odour Management Plan (OMP) for the proposed concession food and drink stands associated with temporary seasonal fairground and Ferris Wheel events located off Princess Margaret Way, Neath Port Talbot, South Wales (hereafter referred to as 'the Site'). The OMP has been prepared by Air Quality Consultants Ltd | Part of Logika Group (AQC) on behalf of the Operator, Studt's Events Ltd, to support the fulfilment of a planning condition¹ associated with the Site, as stated by Neath Port Talbot County Borough Council (NPTCBC):

"Within 3 months of the date of this permission, an Odour Management Plan for all relevant food concessions to be accommodated on the site in association with either the Fairground or Ferris Wheel seasonal events, shall be submitted to and approved in writing by the Local Planning Authority. The approved details shall be fully implemented on site for the duration of each seasonal event. Should the proposed food concessions feature alternative vendors, then a revised Odour Management Plan shall be submitted to and approved in writing by the Local Planning Authority."

Reason: To protect the amenity of the locality in accordance with Policy EN8 of the NPTCBC Local Development Plan (2011–2026) (NPTCBC, 2016)."

This OMP outlines methods by which the Operator will systematically assess, reduce, and, where possible, prevent potentially odorous emissions from the food and drink concession stands on Site. It also identifies nearby sensitive receptors and sets out appropriate mitigation measures to minimise the risk of odour impacts during the operation of relevant food concessions.

The OMP is a working document with the specific aim of ensuring that:

- All potential odour sources at the Site are identified, along with foreseeable situations that may compromise the Operator's ability to prevent and/or minimise odour releases from the proposed activities;
- Appropriate methods, including monitoring and contingency procedures, are employed to control and minimise odour pollution;
- Suitable control measures and responsive actions are implemented to minimise the impact in the event of odour incidents;
- The risk of odour-releasing incidents or accidents is reduced through proactive planning and operational awareness;
- Staff are provided with a clear and practical framework for managing odour-related issues as part of day-to-day operations.

The OMP addresses the potential for odour release and the control measures employed to mitigate risk. These are supported through monitoring procedures, including sniff testing and complaints management to identify elevated levels of odour and respond appropriately.

1.1 Site description

The Site comprises of concession stands for a temporary fairground located within Hollywood Park, situated along Princess Margaret Way on Aberavon seafront in North Port Talbot, South Wales. The Site is bounded by a mix of leisure and commercial uses, including a cinema and a leisure centre, with public car parking and pedestrian access routes surrounding the area. The wider setting includes Aberavon Beach to the south and

¹ Planning application reference: P2025/0214

residential areas located approximately 100 m to the northeast and a new housing development approximately 25 m to the southeast of the Site.

The mobile concession stands will serve a mixture of deep fried cuisine, including; burgers, hot dogs, chips, and doughnuts, prepared using Liquid Propane Gas (LPG) grills and fryers with vegetable oils.

Each concession stand is equipped with an extractor fan to assist in the extraction of cooking fumes from the mobile stand. No additional odour control technologies (such as carbon filters or UV systems) are employed, as these have not been required at other similar sites operated by the client.

The Site is permitted to operate between 10:00 and 22:00, though typical hours are between 12:00 to 20:00. It will be active for a limited number of days during the easter and summer periods. All food preparation and cooking will take place within the concession units, and the Site Operator is registered with Swansea Council.

Figure 1-1 illustrates the main Site boundary and concession stand locations. The planning application is for change of use, and as such, the location of concession stands may be adjusted to suit the operational needs of the business. The locations shown in Figure 1-1 were provided by the client for planning purposes.



Figure 1-1: Site Location

1.2 Maintenance and review of the OMP

The OMP will be reviewed by the Site Manager annually, or sooner if there are any changes to operations, incidents or complaints related to odour.

Any technical and managerial changes on site will also initiate a review of the OMP, to ensure that the odour control techniques and abatement systems remain appropriate for the Site.

The OMP will be stored electronically on a server which is accessible to all members of staff. The OMP will be stored with other Environmental Management System documentation and procedures.

Training in the implementation of the OMP and associated monitoring will be provided by the Site Manager and/or appropriate alternative senior management. Training will be carried out as part of the initial induction process, with annual refreshers, and in the event of a non-conformance or incident.

An OMP is a live document that requires updates based on changes to onsite activities or complaints. The Site Manager will be responsible for ensuring any required updates are made, ensuring all staff have the required training to carry out their responsibilities, and for the implementation of measures outlined in this OMP.

1.3 Relevant sector guidance on which this OMP is based

This OMP has been prepared with reference to the following key guidance:

- Environment Agency (EA) (2011) *How to comply with your environmental permit, Additional guidance for H4 Odour Management* (Environment Agency, 2011)
- Institute of Air Quality Management (IAQM) (2018) *Guidance on the assessment of odour for planning* (IAQM, 2018)

The full legislative, policy, and guidance context relating to odour is provided in Appendix A1.

2 Odour Risk Assessment

An odour risk assessment has been prepared following the approach outlined in Appendix A2, with the full assessment provided in Appendix A3. It evaluates the potential for odour impacts from the Site and the associated risk to nearby receptors.

2.1 Overview of odorous processes

The assessment identified the potential odour sources associated with the operation of the concession stands, which are summarised in Appendix A3. This includes cooking activities (grilling and frying) with the operation of the extractor fans, with details of frequency, intensity and expected offensiveness.

The main odours associated with the concession stands include those associated with grilling and frying activities, using vegetable oils. These activities are expected to generate odours primarily through the release of cooking fumes and vapours, with potential for fugitive emissions to atmosphere. Each concession stand is fitted with an extractor fan, which operates during cooking hours to assist in the dispersion of odorous emissions.

Although cooking will take place in open or semi-enclosed setups, rather than sealed systems, the odours generated from grilling or frying are typical of food preparation. The presence of extractor fans helps to reduce the intensity of emissions. Given the nature of the cuisine, the temporary outdoor setting, and the limited duration of operation, fugitive emissions are expected to be small-scale and of moderate to low offensiveness.

2.2 Sensitive Receptors

Locations sensitive to odours emitted during Site operations will be places where people are regularly present. The sensitivity of a location will be dependent on the land use, the frequency and length of time receptors are present there, and the expected level of amenity in each given location. Generally, residential properties are considered to be the most sensitive receptors to odours.

A overview of the local area surrounding the Site is shown in Figure 2-1. The nearby residential properties are judged to be of high sensitivity to any odours, whereas the commercial/recreational premises are judged to be of medium sensitivity.



Figure 2-1: Surrounding Land Uses Relative to the Site Boundary

3 Odour Control Measures and Best Practice

Good management practices will help to ensure that odour impacts from the Site are kept to a minimum. Table 3-1 provides a summary of good practice management measures that will be implemented at the Site.

Table 3-1: Good Management Practice Measures

Management Area	Good Practice Measure
Staff Training	All staff should be made aware of the requirements of the OMP and trained in good housekeeping practices. This includes understanding how cooking activities may contribute to the odour emissions and ensuring extractor fans are operating effectively during food preparation. The Site Operator is responsible for ensuring these measures are implemented.
Operational Hours and Scheduling	Cooking activities are limited to specific periods of operation, as permitted by the planning approval. This restriction on operational days and hours helps to manage the overall duration of odour emissions and supports effective control measures.
Complaint Procedure	A trained member of staff should be available to respond to any odour-related complaints. Complaints should be formally recorded and investigated, with appropriate remedial action taken. If a complaint is received, a boundary odour check should be undertaken.
Records and Review	Records of extractor fan maintenance, staff training, and any odour-related complaints should be kept in the OMP. An annual review of the OMP should be undertaken, or earlier if complaints are received or operational changes are proposed.
Odour Surveys	Regular odour surveys should be undertaken by a designated employee/ the Site Operator to monitor potential odour emissions. These surveys should include boundary sniff testing, during operational hours, following the procedure, and using the form, set out in Appendix A4. If any odour incidents or complaints occur, the frequency of surveys should be increased to daily until the issue is resolved. All findings should be recorded and used to inform ongoing odour management practices.
Contingency Odour Controls	Should odour complaints arise, the operator will assess the cause and evaluate the feasibility of installing supplementary odour control measures, such as carbon filters or UV systems. Where complaints are substantiated and odour impacts are deemed significant, appropriate mitigation measures will be implemented.
Maintenance Programme	Cleaning and maintenance of extractor fans and cooking equipment should be pre-planned where possible to avoid disruption during operational hours. While odour release during maintenance is expected to be minimal, care should be taken to ensure that works do not coincide with peak visitor periods. The Site Operator is responsible for ensuring cleaning and maintenance is carried out in line with manufacturer guidelines and that all equipment remains in good working order.
External Communications	If required, and prior to the commencement of operations, an inception meeting may be held with NPTCBC to address any concerns and provide relevant information regarding odour management and operational practices.

4 Odour Incidents

This section considers the potential for accidents (or incidents) which would result in the loss of control or effective management of odorous substances and could have a short-term impact on the local community.

Under unusual circumstances there is a higher risk of odours. Events that may lead to a higher risk of odour are identified in Table 4-1, along with additional measures to be implemented during these incidents.

Table 4-1: Odour Incident Measures

Potential Incident	Description of Incident	Measure
Extractor Fan Failure	A mechanical fault or power issue results in extractor fans not operating during cooking hours, leading to increased odour emissions (due to reduced dispersion capability).	The Site Operator will ensure extractor fans are regularly cleaned and maintained in line with manufacturer guidelines to minimise the risk of failure. In the event of a breakdown, cooking activities should be reduced or paused until the issue is resolved. If odour complaints are received, a boundary sniff test should be undertaken and recorded. Any complaints should be logged and investigated using the Complaint Record Form (Appendix A5).

5 Appendices

A1 Odour in Legislation, Policy and Guidance

A1.1 National Legislation

A1.1.1 Environmental Protection Act

There are currently no statutory standards in the UK covering the release and subsequent impacts of odours. This is due to complexities involved with measuring and assessing odours against compliance criteria, and the inherently subjective nature of odours.

It is recognised that odours have the potential to pose a nuisance for residents living near to an offensive source of odour. Determination of whether or not an odour constitutes a statutory nuisance in these cases is usually the responsibility of the local planning authority or the Environment Agency. The Environmental Protection Act 1990 (1990) outlines that a local authority can require measures to be taken where any:

“dust, steam, smell or other effluvia arising on an industrial, trade and business premises and being prejudicial to health or a nuisance...” or

“fumes or gases are emitted from premises so as to be prejudicial to health or cause a nuisance.”

Odour can also be controlled under the Statutory Nuisance provisions of Part III of the Environmental Protection Act.

A1.2 Planning Policy

A1.2.1 National Planning Policy Framework

The National Planning Policy Framework (NPPF) (2024) sets out planning policy for England. It states that the purpose of the planning system is to contribute to the achievement of sustainable development, and that the planning system has three overarching objectives, one of which is an environmental objective:

“to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy”.

To prevent unacceptable risks from pollution, the NPPF states that:

“Planning policies and decisions should contribute to and enhance the natural and local environment by...preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air quality”.

and

“Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development”.

The NPPF also sets out the ‘agent of change’ principle that new developments should not impose unreasonable restrictions on existing activities:

“Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of

development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed."

The NPPF is supported by Planning Practice Guidance (PPG) (Ministry of Housing, Communities & Local Government, 2024) which makes clear that "Odour...can also be a planning concern, for example, because of the effect on local amenity". It also provides guidance on options for mitigating impacts, and states that "Mitigation options will need to be locationally specific, will depend on the proposed development and need to be proportionate to the likely impact".

A1.2.2 Local Policy

The current NPTCBC Local Development Plan (NPTCBC, 2016), was adopted in January 2016. Policy EN8, Pollution and Land Suitability, relates to protecting local amenity and states:

"Proposals which would be likely to have an unacceptable adverse effect on health, biodiversity and/or local amenity or would expose people to unacceptable risk due to the following will not be permitted:

- Air pollution;
- Noise pollution;
- Light pollution;
- Contamination;
- Land instability;
- Water (including groundwater) pollution.

Proposals which would create new problems or exacerbate existing problems detailed above will not be acceptable unless mitigation measures are included to reduce the risk of harm to public health, biodiversity and/or local amenity to an acceptable level."

A1.3 Odour Guidance

A1.3.1 Environment Agency Guidance

The Environment Agency has produced a horizontal guidance note (H4) on odour assessment and management (Environment Agency, 2011), which is designed for operators of Environment Agency-regulated processes (i.e., those which classify as Part A(1) processes under the Pollution Prevention and Control (PPC) regime). The H4 guidance document is primarily aimed at methods to control and manage the release of odours but also contains a series of recommended assessment methods which can be used to assess potential odour impacts.

A1.3.2 Institute of Air Quality Management Guidance

The latest UK guidance on odour was published by the Institute of Air Quality Management (IAQM) in 2018 (IAQM, 2018). The IAQM guidance sets out assessment methods which may be utilised in the assessment of odours for planning applications. It is the only UK odour guidance document which contains a method for estimating the significance of potential odour impacts.

The IAQM guidance endorses the use of multiple assessment tools for odours, stating that, "*best practice is to use a multi-tool approach where practicable*". This is in order to improve the robustness of the assessment conclusions. Some of the methods outlined in the IAQM guidance have been adopted in this odour assessment.

A2 Odour Risk Assessment Approach

The odour risk assessment set out in the IAQM guidance follows a Source-Pathway-Receptor approach. This approach describes the concept that, in order for an odour impact (such as annoyance or nuisance) to occur, there must be a source of odour, a pathway to transport the odour to an off-site location, and a receptor (e.g. people) to be affected by the odour.

The risk of odour effects at a given receptor location may be estimated using the following fundamental relationship:

$$\text{Effect} \approx \text{Dose} \times \text{Response}$$

In this relationship, the **dose** is a measure of the likely exposure to odours, in other words the **impact**. The **response** is determined by the sensitivity of the receiving environment and thus the overall **effect** is the result of changes in odour exposure at specific receptors, taking into account their sensitivity to odours.

In order to determine the risk of potential odour effects from the farm, the 'FIDOR' factors for odour exposure have been used, as described in Table A 2-1.

Table A 2-1: Description of the FIDOR factors

Factor	Description
Frequency	The frequency with which odours are detected.
Intensity ^a	The degree to which an odour is detectable on a 0-6 scale where: 0 = No odour 1 = Very faint odour (there is probably some doubt as to whether the odour is actually present) 2 = Faint odour (the odour is present but cannot be described using precise words or terms) 3 = Distinct odour (the odour character is barely/just recognisable) 4 = Strong odour (the odour character is easily recognisable) 5 = Very strong odour (the odour is offensive; exposure to this level would be considered undesirable) 6 = extremely strong odour (the odour is offensive; an instinctive reaction would be to mitigate against further exposure)
Duration	The duration of exposure to detectable odours.
Offensiveness	The level of pleasantness or unpleasantness of odours, in relation to its Hedonic Tone. Hedonic Tone is scored on a scale of +4 to -4 where: +4 = Pleasant odours; 0 = Neutral odours; and -4 = Foul odours.
Receptor sensitivity	The sensitivity of the location where odours are detected, and/or the proximity of odour releases to an odour-sensitive location.

Odour emissions from the farm have been assigned a risk-ranking based on the "effect $\approx$ dose x response" relationship, whereby the dose (impact) is determined by the "FIDO" part of FIDOR, and the response is determined by the "R" (receptor sensitivity). The risk of odour effects can therefore be described as:

$$\text{Effect} \approx \text{Impact (FIDO)} \times \text{Receptor Sensitivity (R)}$$

The key factors that will influence the effects of odours are the magnitude of the odour source, the effectiveness of the pathway for transporting odours, and the sensitivity of the receptor. The methodology set out in the IAQM guidance document describes in detail a Source-Pathway-Receptor approach to odour risk assessment and

includes tables and matrices to assist in determining the likely risk of odour effects. The IAQM methodology is outlined below. It includes an element of professional judgement.

The assessment examines the source odour potential (source magnitude) and then identifies the effectiveness of the pathway and receptor sensitivity at sensitive locations.

Table A2-2 describes the risk-rating criteria (high, medium and low) for source odour potential, pathway effectiveness and receptor sensitivity applied in this assessment. This table has been adapted from Table 8 in the IAQM odour guidance.

Table A2-2: Source-Pathway-Receptor Risk Rating

Source Odour Potential	Pathway Effectiveness	Receptor Sensitivity
Large Source Odour Potential: Large-scale odour source and/or a source with highly unpleasant odours (hedonic tone -2 to -4); no odour control.	Highly Effective Pathway: Very short distance between source and receptor; receptor downwind of source relative to prevailing wind; ground level releases; no obstacle between source and receptor.	High Sensitivity: Highly sensitive receptors e.g. residential properties and schools.
Medium Source Odour Potential: Medium-scale odour source and/or a source with moderately unpleasant odours (hedonic tone 0 to -2); basic odour controls.	Moderately Effective Pathway: Receptor is local to the source; releases are elevated but compromised by building effects.	Medium Sensitivity: Moderately sensitive receptors e.g. commercial and retail premises, and recreation areas.
Small Source Odour Potential: Small-scale odour source and/or a source with pleasant odours (hedonic tone +4 – 0); best practise odour controls.	Ineffective Pathway: Long distance between source and receptor (>500 m); receptors upwind of source relative to prevailing wind; odour release from stack/high level.	Low Sensitivity: Receptors not sensitive e.g. industrial activities or farms.

The risk ratings for source magnitude and pathway effectiveness (for each receptor) identified using the criteria in Table A2-2 are then combined using the matrix shown in Table A2-3 to estimate an overall risk of odour impact at each specific receptor location.

Table A2-3: Assessment of Risk of Odour Impact at a Specific Receptor Location

Pathway Effectiveness	Source Odour Potential (Source Magnitude)		
	Large	Medium	Small
Highly Effective	High Risk	Medium Risk	Low Risk
Moderately Effective	Medium Risk	Low Risk	Negligible Risk
Ineffective	Low Risk	Negligible Risk	Negligible Risk

The next stage of the risk assessment is to identify the potential odour effect at each receptor location. This is done using the matrix presented in Table A2-4, which combines the overall odour impact risk descriptor for each receptor with the receptor sensitivity determined using the criteria in Table A2-2.

Table A2-4: Assessment of Risk of Odour Impact at a Specific Receptor Location

Risk of Odour Impact	Receptor Sensitivity		
	High	Medium	Low
High Risk	Substantial Adverse Effect	Moderate Adverse Effect	Slight Adverse Effect
Medium Risk	Moderate Adverse Effect	Slight Adverse Effect	Negligible Effect
Low Risk	Slight Adverse Effect	Negligible Effect	Negligible Effect
Negligible Risk	Negligible Effect	Negligible Effect	Negligible Effect

As a final stage of assessment, an overall significance of odour effects is determined, based on professional judgment and taking into account the significance of the effect at each specific receptor location.

A3 Odour Risk Assessment

This appendix presents the detailed odour risk assessment for the concession stands, following IAQM guidance (IAQM, 2018).

A3.1 Source Odour Potential

The first step of the odour risk assessment is to identify the source odour potential or odour magnitude. This takes into account the scale and nature of the odorous processes; the continuity, intensity and offensiveness of odour releases; and any odour control measures that are used. In essence, it must consider the odour potential of the source with respect to the FIDO part of FIDOR.

The main odours at the Site will arise from grilling and frying food in the concession stands, using vegetable oils, which release cooking fumes and vapours. These emissions may escape into the atmosphere, particularly given the open or semi-enclosed cooking setups. Each concession stand is fitted with an extractor fan to help reduce odour intensity during cooking hours. Due to the temporary outdoor nature of the setup and the type of food being prepared, fugitive emissions are expected to be of moderate to low offensiveness.

The main potential odour sources and overall source odour potential for the Site are described in Section 2.1 and Table A3-1.

Table A3-1: Identification of Potential Odour Sources and Overall Source Odour

Odour Sources	Description	Frequency and Duration	Intensity and Offensiveness
Cooking (grilling and frying) and extractor fan operation in the concession stands	Odours arising from the grilling and frying burgers, hot dogs, chips and doughnuts using LPG grills and fryers with vegetable oil. Each concession stand will be fitted with an extractor fan to remove cooking fumes from the concession stand. No additional odour control technologies are employed.	Cooking occurs daily during operational periods: 17 days across March-April and 8 across July-August, typically between 12pm and 8pm. Extractor fans will be operational during cooking hours. The presence of the fairground will be temporary (approximately 3 years).	Fat frying is considered to be of moderate offensiveness in IAQM odour guidance. The Scottish Environmental Protection Agency (SEPA) odour guidance provides an indication of the hedonic tone ^a of 'oily, fatty' odours (similar in character to what may be expected from the frying odours produced). This scored -1.41, which is on the lower end of the scale of offensiveness. Given the outdoor setting and seasonal and temporary nature of the operations, emissions are judged to be of low to moderate offensiveness. Extractor fans will be used to help disperse odours.
Overall Source Odour Potential	Given the low to moderate offensiveness of the odours, the nature of dispersion, the size of the source, and the temporary nature of the operation, the overall source odour potential of the concession stands at the temporary fairground is judged to be Small .		

^a Hedonic tone is a scale of the relative offensiveness of an odour from -4 to +4, with negative scores representing degrees of 'unpleasant' odours, and positive scores representing degrees of 'pleasant' odours, with 0 being neutral.

A3.1.1 Pathway Effectiveness

In order to consider the effectiveness of the pathway, it is important to consider receptor locations in terms of their proximity to the odour sources and the prevailing wind direction.

Locations sensitive to odours emitted during Site operations will be places where people are regularly present. The sensitivity of a location will be dependent on the land use, the frequency and length of time receptors are present there, and the expected level of amenity in each given location. Generally, residential properties are the most sensitive receptors to odours.

A review of the local area surrounding the Site is shown in Figure A 3-1. Specific receptors have been identified based on their land use and proximity to the Site. The nearby residential properties are judged to be of high sensitivity to any odours which may be generated by the concession stands, whereas the commercial/recreational premises are judged to be of medium sensitivity.

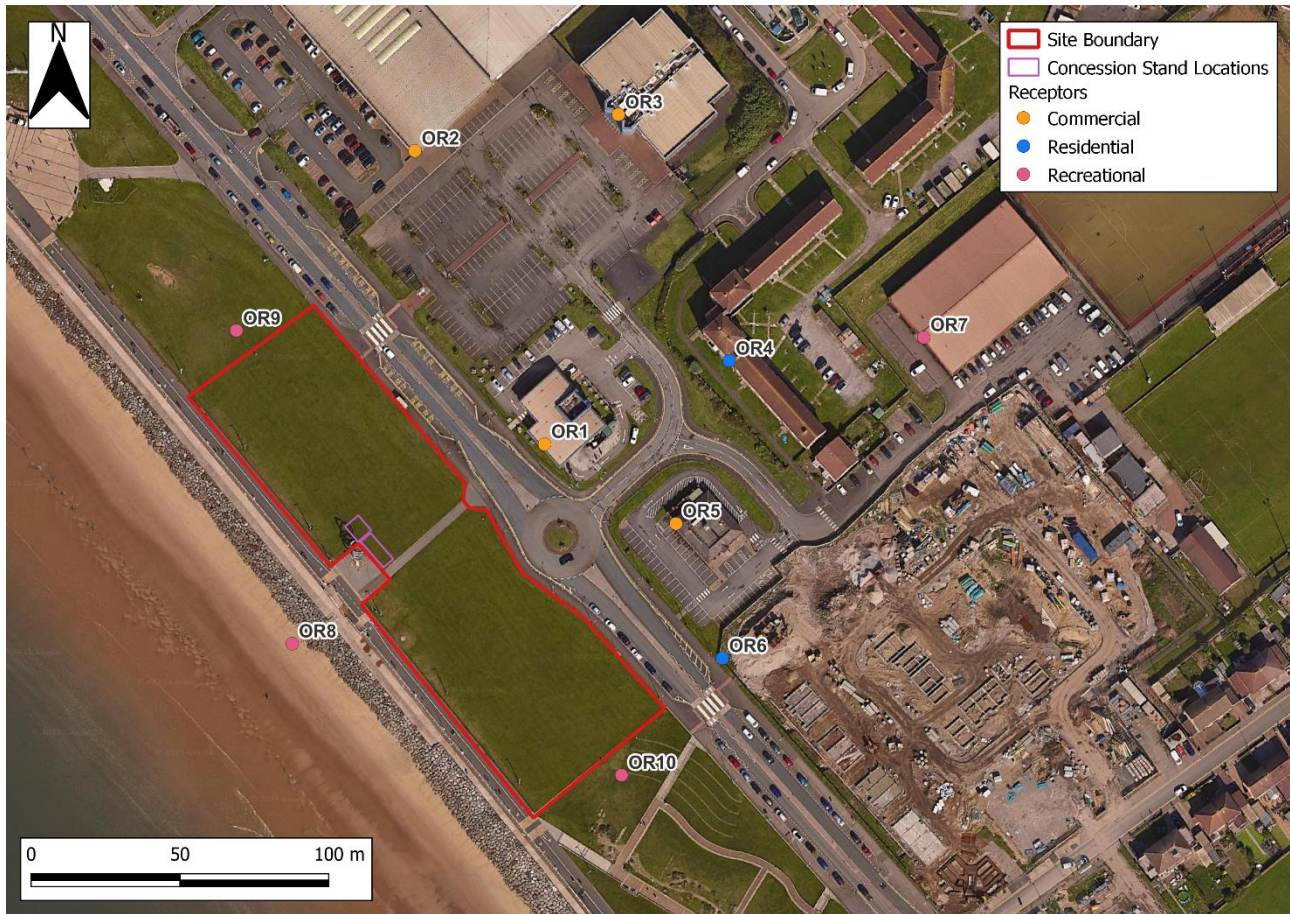


Figure A 3-1: Site Location and Receptor Locations

Figure A 3-2 presents the wind rose from Mumbles Head Meteorological Station, showing the distribution of windspeeds and direction in the most recently available meteorological dataset. Mumbles Head Meteorological Station is located approximately 12 km east of the Site location and is considered the most representative weather station for the Site. The prevailing wind direction has dominant components from the west and southwest. In general, odours will be transported by the wind and will not be detectable at locations upwind of a source. The exception to this is during very light wind conditions when odours may disperse against the wind direction, although typically for relatively short distances.

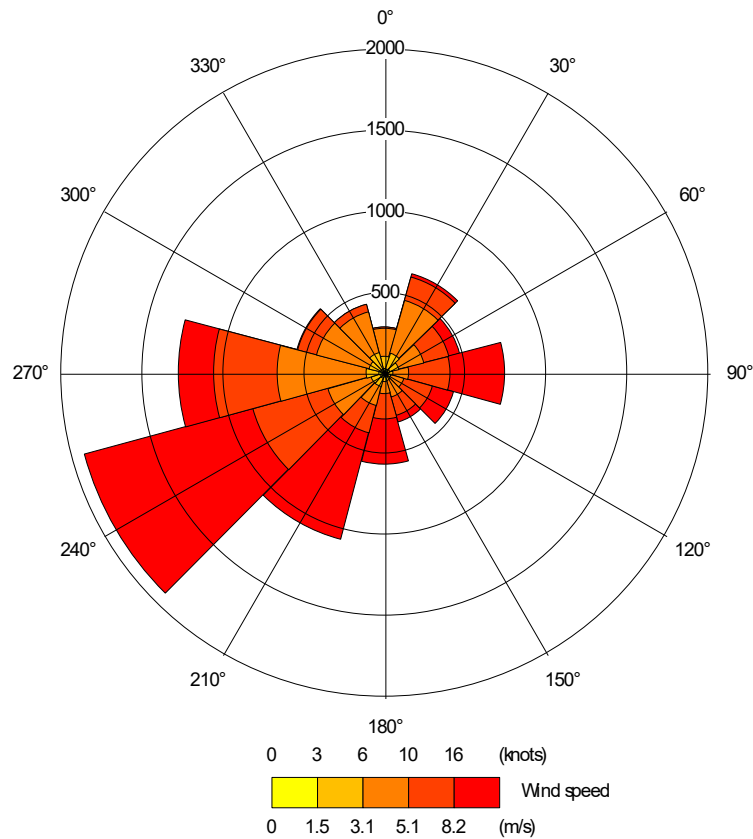


Figure A 3-2: Mumbles Head Meteorological Station – Wind Rose (2023)

The effectiveness of the odour pathway between the Site and nearby sensitive receptors is summarised in Table A3-2, which draws upon the guidance set out in Table A2-2.

Table A3-2: Effectiveness of Odour Pathway

Receptor			Distance from Source ^a	Direction	% Winds from Source	Pathway Effectiveness ^b
ID	Description	Receptor Type				
OR1	Restaurant	Commercial	29 m	Northeast	6.8	Highly effective
OR2	Leisure Centre	Commercial	61 m	North-northeast	2.8	Highly effective
OR3	Cinema	Commercial	118 m	North-northeast	3.6	Moderately effective
OR4	Residence of Carmarthen House	Residential	100 m	Northeast	6.8	Highly effective
OR5	Restaurant	Commercial	44 m	East	3.7	Highly effective
OR6	Residents of New Housing Development	Residential	25 m	Southeast	2.3	Highly effective
OR7	Football Club	Recreational	147 m	East-northeast	7.0	Moderately effective

Receptor			Distance from Source ^a	Direction	% Winds from Source	Pathway Effectiveness ^b
ID	Description	Receptor Type				
OR8	Port Talbot Beach	Recreational	20 m	Southwest	3.0	Highly effective
OR9	Hollywood Park	Recreational	<10 m	South	1.3	Highly effective
OR10	Hollywood Park	Recreational	<10 m	Southeast	2.3	Highly effective

^a Measured as distance to the Site boundary

^b Overall pathway effectiveness is based on professional judgement, taking account of distance between source and receptor, and frequency of winds. As the exact locations of the concession stands are subject to change, the Site boundary has been used as the reference point for assessing odour pathway effectiveness.

All receptors are located within approximately 150 m of the Site boundary and have been assessed as having either a highly or moderately effective odour pathway, based on their proximity and orientation relative to the prevailing south-westerly wind direction. Although OR8, OR9 and OR10 are recreational receptors and located upwind or crosswind of the Site, they have been classified as having a highly effective pathway due to their immediate proximity to the source, which may result in odour exposure under variable wind conditions. Due to the temporary nature of the operations, the pathway effectiveness will be highly dependent on the specific meteorological conditions during the period of operation.

A3.1.2 Receptor Sensitivity

The sensitivity of each of the receptors is set out in Table A3-3. Receptor sensitivities are based on the descriptors presented in Table A2-2.

A3.1.3 Potential Odour Effects

The assessments of the potential odour effects at sensitive receptor locations are presented in Table A3-3. This brings together the source odour potential, effectiveness of pathway and receptor sensitivity identified using the criteria described in Table A2-2, to identify an overall potential for odour effects, using the matrices set out in Table A2-3 and Table A2-4.

Table A3-3: Assessment of Potential Odour Effects from the Concession Stands

Receptor	Risk of Odour Impact (Dose)			Receptor Sensitivity	Likely Odour Effect
	Source Odour Potential	Effectiveness of Pathway	Risk of Odour Impact		
OR1	Small	Highly effective	Low risk	Medium	Negligible Effect
OR2	Small	Highly effective	Low risk	Medium	Negligible Effect
OR3	Small	Moderately effective	Negligible Risk	Medium	Negligible Effect
OR4	Small	Highly effective	Low risk	High	Slight Adverse Effect
OR5	Small	Highly effective	Low Risk	Medium	Negligible Effect

Receptor	Risk of Odour Impact (Dose)			Receptor Sensitivity	Likely Odour Effect
	Source Odour Potential	Effectiveness of Pathway	Risk of Odour Impact		
OR6	Small	Highly effective	Low Risk	Low	Negligible Effect
OR7	Small	Moderately effective	Negligible Risk	Medium	Negligible Effect
OR8	Small	Highly effective	Low Risk	Medium	Negligible Effect
OR9	Small	Highly effective	Low Risk	Medium	Negligible Effect
OR10	Small	Highly effective	Low Risk	Medium	Negligible Effect

The potential odour effects have been identified using the effect $\approx$ dose x response relationship identified in Appendix A2. The process is described as follows:

A) Identify the impact:

Based on a small source odour potential; where the pathway is deemed to be moderately effective, then the risk of odour impacts (dose) is judged to be negligible risk (Table A3-3). Where the effectiveness of pathway is deemed to be highly effective, the risk of odour impacts is low risk.

B) Consider the response:

Based on the matrix presented in Table A2-4, the odour effects at each receptor are identified as follows: A negligible risk of odour impacts will lead to a negligible odour effect regardless of receptor sensitivity. A low risk of odour impact at a low or medium sensitivity receptor will lead to a negligible odour effect. A low risk of odour impact at a high sensitivity receptor will lead to a slight adverse odour effect.

The potential odour effects at each receptor location are summarised in the final column of Table A3-3. The final stage of the risk assessment is to make an overall judgement as to the likely significance of effects.

In this case it is judged that that overall significance of odour effects is not significant. This conclusion is based on the findings of the risk assessment that have identified a negligible to low risk of odour effects at receptor locations. All predicted odour effects are negligible, with the exception of OR4 where a slight adverse effect could occur, if winds are blowing towards that receptor during operation and stands are located near to the closest site boundary. According to the IAQM odour guidance (IAQM, 2018), effects are only likely to be considered significant where they are greater than 'slight adverse'; therefore, the overall impact is considered not significant.

A4 Sniff test procedure and form

A4.1 Procedure

A trained and odour acuity tested site operator will survey the inner boundary of the site on a daily basis. Surveys should also be carried out immediately after an odour-related complaint has been received.

The appointed person should walk slowly along the entire site boundary and breathe normally. If an odour cannot be detected in this way, then periodically stand still and inhale deeply facing upwind. At regular intervals along the boundary, the operator shall stop and record any odours that are detected. The intensity should be noted using the criteria set out in the table footnote overleaf, and, where relevant, a description of the odour should be recorded. It is recommended that observations are made at a minimum of ten equally spaced locations along the site boundary. If odour is detected whilst standing still and inhaling deeply facing upwind, then intensity should be recorded as at least 2 (faint odour). If odour is detected while walking, the intensity should be recorded as at least 3 (distinct odour).

At each location, records of the meteorological conditions at the time of the test should also be recorded, as set out in the table overleaf. Wind speed and direction should be measured by the operator using an anemometer or be obtained from the Met Office website at the time of the test.

If odours related to the site operations are detected, the site procedures and OMP should be reviewed, and necessary actions then implemented to reduce the odours generated by onsite activities.

Specific attention to the following points of detail shall be noted:

- The surveyor should not smoke or consume strongly flavoured food or drink for at least half an hour before the assessment is carried out;
- The consumption of confectionary or soft drinks should be avoided immediately before and during the assessment;
- Perfumes/ deodorants or any other strong scented toiletries should not be applied immediately before or during an assessment; and
- If the surveyor has a cold, or a sore throat that inhibits the ability to detect odours then an alternative surveyor should be nominated. If this is not possible then the surveyor's condition should be noted in the assessment report and site diary.

A4.2 Sniff test form

The form overleaf, which has been adapted from the 'Odour Report Form' in the Environment Agency's H4 Odour Guidance, will be used for the sniff tests. The first column has been completed to provide an example of the information that is required.

A new form will be used for each survey; more than one form will be required if the survey involves more than five sniff test locations. Once completed, the forms should be filed in the site office, with an electronic copy also saved where possible.

Table A1-1: Sniff Test Form (example)

Sniff Test Report Form		Date: 12/03/2025			
Test Number	1	2	3	4	5
Time of Test	09:10				
Location of Test	At location of complaint				
Weather Conditions	Clear, dry				
Wind Speed	5 m/s				
Wind Direction	NNW				
Odour Intensity	3				
Duration of Test	2 mins				
Constant Odour?	Yes				
Odour Character	Rotting vegetable matter				
Do Odours Relate to Site Operations?	Yes				
Any Other Observations or Comments	Odour was constant. Test was done near to houses.				
Investigative or Remedial Action Required?	Yes – inform site manager				

Intensity scale:

- 0 No odour /not perceptible - No odour when compared to clean air.
- 1 Very faint odour - There is probably some doubt as to whether the odour is actually present.
- 2 Faint odour - The odour is present but cannot be described using precise words or terms.
- 3 Distinct odour - The odour character is barely recognisable.
- 4 Strong odour - The odour character is easily recognisable.
- 5 Very strong odour - The odour is offensive. Exposure to this level would be considered undesirable.
- 6 Extremely strong odour - The odour is offensive. An instinctive reaction would be to mitigate against further exposure.

A5 Odour complaints report form

Odour Complaint Report Form	
Time and date of complaint:	Name and address of complainant:
Telephone number of complainant:	
Date of odour:	
Time of odour:	
Location of odour, if not at above address:	
Weather conditions (i.e., dry, rain, fog, snow):	
Temperature (very warm, warm, mild, cold or degrees if known):	
Wind strength (none, light, steady, strong, gusting):	
Wind direction (e.g., from NE):	
Complainant's description of odour: What does it smell like?	
Intensity (see below):	
Duration (time):	
Constant or intermittent in this period:	
Does the complainant have any other comments about the odour?	
Are there any other complaints relating to the installation, or to that location (either previously or relating to the same exposure)?	
Any other relevant information:	
Do you accept that odour likely to be from your activities?	
What was happening on site at the time the odour occurred?	

Operating conditions at the time the odour occurred:		
Actions taken:		
Form completed by:	Date:	Signed :

Intensity scale:

- 0 No odour /not perceptible - No odour when compared to clean air.
- 1 Very faint odour - There is probably some doubt as to whether the odour is actually present.
- 2 Faint odour - The odour is present but cannot be described using precise words or terms.
- 3 Distinct odour - The odour character is barely recognisable.
- 4 Strong odour - The odour character is easily recognisable.
- 5 Very strong odour - The odour is offensive. Exposure to this level would be considered undesirable.
- 6 Extremely strong odour - The odour is offensive. An instinctive reaction would be to mitigate against further exposure.



London • Bristol • Warrington • Brighton • Brussels